

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

Case No. 1:21-cr-260-6-LMB

CARLOS JOSE TURCIOS VILLATORO,

Defendant.

**MOTION TO JOIN AREVALO'S MOTION
FOR SPECIFIC RELIEF TO ENFORCE COURT'S BRADY ORDER**

Together with Cristian Arevalo Arias, Carlos Turcios Villatoro is charged with the double murder in this case.

As set forth in Mr. Arevalo's motion, the government first charged Abner Molina with the double murder, after he confessed to committing it alone. The government has demonstrated a consistent pattern of withholding exculpatory *Brady* evidence demonstrative of Molina's guilt. Among other things, the government has allowed the destruction of jail calls in which Molina is attempting to concoct an alibi, together with all notes and translations of them. Moreover, without telling the defense, the government deported an important witness, Juan Vasquez, who told the government how, the morning after the double murder, Mario Guevara showed him the gun and told him he'd committed the double murder with Molina—and only Molina. As also set forth in Mr. Arevalo's motion, there have been issues with the government withholding important impeachment material for its cooperating witnesses.

And now, days before trial, the government has disclosed *Brady* material showing that Molina confessed his involvement in the double murder to another person—A.R. This is the first we've heard that Molina confessed to this person. This material is also *Jencks* material, well past


the *Jencks* deadline, and was only produced because Mr. Arevalo specifically asked for it. There is no time to conduct an investigation into this information.

These are not small issues. Along with Mr. Arevalo, Mr. Turcios's trial defense is prejudiced. He requests the same relief.

Thank you,

CARLOS JOSE TURCIOS VILLATORO
By Counsel

By:

/s/ 
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CERTIFICATE OF SERVICE

I certify that on January 17, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sends a notification of filing (NEF) to all counsel of record.

/s/ 
Elizabeth L. Van Pelt